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CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2010 Grand Jury

CR 11 00385
UNITED STATES OF AMERICA,) CR No. 11
Plaintiff,) I N D I C T M E N T
v.) [18 U.S.C. § 875(c): Making
ROBERT COOK,) Threats Through Interstate
Defendant.) Communications;
18 U.S.C. § 2261A: Stalking]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 875(c)]

On or about May 23, 2010, in Los Angeles County, within the Central District of California, and elsewhere, defendant ROBERT COOK knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, namely, victim K.S., with the intent to threaten victim K.S.

CMK

COUNT TWO

[18 U.S.C. § 875(c)]

On or about May 28, 2010, in Los Angeles County, within the Central District of California, and elsewhere, defendant ROBERT COOK knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, namely, victim K.S., with the intent to threaten victim K.S.

COUNT THREE

[18 U.S.C. § 2261A(2)(A)]

Beginning on or about May 23, 2010, and continuing to on or about May 28, 2010, in Los Angeles County, within the Central District of California, and elsewhere, defendant ROBERT COOK ("COOK"), with the intent to harass and to cause substantial emotional distress to a person in another state, namely, victim K.S., used a facility of interstate and foreign commerce to engage in a course of conduct that caused substantial emotional distress to victim KS and that placed victim K.S. in reasonable fear of the death and serious bodily injury to victim K.S.

Defendant COOK's course of conduct included, among other things, the following:

a. On or about May 23, 2010, when victim K.S. was in a different state from defendant COOK, defendant COOK used a cellular phone to make a threatening and harassing call to victim K.S. at her place of employment, during which call defendant COOK stated, in part: "I swear to fucking God, it's going to get bloody."

b. On or about May 28, 2010, when victim K.S. was in a different state from defendant COOK, defendant COOK used a cellular phone to make a threatening and harassing call to victim K.S. at her place of employment, during which call defendant COOK stated, in part: "And listen, you're going to pay for everything

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1 you've given me. Do you hear that bitch? You're going to pay
2 for the pain you're putting me through. You're going to fucking
3 pay."

4
5 A TRUE BILL

6
7 151

8 Foreperson

9 ANDRÉ BIROTTE JR.
10 United States Attorney

11 

12 ROBERT E. DUGDALE
13 Assistant United States Attorney
14 Chief, Criminal Division

15 CURTIS A. KIN
16 Assistant United States Attorney
17 Chief, General Crimes Section

18 TRACY WILKISON
19 Assistant United States Attorney
20 Deputy Chief, General Crimes Section

21 MEGHAN A. BLANCO
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